

STATE OF NEW YORK

COUNTY OF ST LAWRENCE

TOWN \_\_\_\_\_ COURT \_\_\_\_\_

TOWN \_\_\_\_\_ of MASSENA

Defendant: NA  
(Relationship to alleged victim)

Alleged Victim: NA  
(Relationship to defendant)

THE PEOPLE OF THE STATE OF NEW YORK

- VS. -

Date of Birth

RICHARD L PRICE

Defendant(s)

BE IT KNOWN THAT, by this INFORMATION, SUSAN H HAUER,  
as the Complainant herein, RESIDING at [REDACTED] MASSENA NY 13662,  
accuses the above mentioned Defendant(s), with having COMMITTED the MISDEMEANOR  
of FORCIBLE TOUCHING in violation of Section 130.52  
Subdivision \_\_\_\_\_ of the PENAL Law of the State of New York.

That on or about 01/03/2017 at about 03:00 PM  
in the TOWN of MASSENA, County of ST LAWRENCE, the defendant(s)

did intentionally, knowingly and unlawfully commit the misdemeanor of FORCIBLE TOUCHING: FORCIBLY TOUCH OTHER PERSON'S SEXUAL/INTIMATE PARTS. A person is guilty of forcible touching when such person intentionally, and for no legitimate purpose, forcibly touches the sexual or other intimate parts of another person for the purpose of degrading or abusing such person; or for the purpose of gratifying the actor's sexual desire. For the purposes of this section, forcible touching includes squeezing, grabbing or pinching. Forcible touching is a class A misdemeanor.

On January 3, 2017 at approximately 3:00pm, Richard Price did intentionally, knowingly and unlawfully touch the breasts of [REDACTED] at the St. Lawrence Seaway Development Corporation building MB8, located at 251 Fregoe Road in the Town of Massena. All contrary to the above mentioned statute.

The above allegations of fact are made by the Complainant herein on direct knowledge and/or upon information and belief, with the sources of Complainant's information and the grounds for belief being the facts contained in the attached SUPPORTING DEPOSITION(s) of: SUSAN H. HAUER & [REDACTED]

In a written instrument, any person who knowingly makes a false statement which such person does not believe to be true has committed a crime under the laws of the State of New York punishable as a Class A Misdemeanor. (PL 210.45)

Affirmed under penalty of perjury

this 03<sup>RD</sup> day of FEBRUARY, 2018

--OR--

Subscribes and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

[Signature]  
COMPLAINANT - 4267

## NEW YORK STATE POLICE

THE PEOPLE OF THE STATE OF NEW YORK

-- vs. --

RICHARD PRICE

Defendant(s)

INCIDENT LOCATION:STATE OF NEW YORK LOCAL CRIMINAL COURTCOUNTY OF ST LAWRENCETOWN of MASSENALOCATION OF DEPOSITION:

STATE OF NEW YORK

COUNTY OF ST LAWRENCEVILLAGE of MASSENA

|               |                              |                |                          |    |                         |
|---------------|------------------------------|----------------|--------------------------|----|-------------------------|
| On            | Date<br>02/02/2018           | at             | Time Started<br>02:18 PM | I, | Full Name<br>[REDACTED] |
| Date of Birth | No. and Street<br>[REDACTED] | CITY<br>MADRID | State<br>NY              |    |                         |

## State The Following:

I am giving this statement to Trooper Stephanie Simpson of the New York State Police regarding an incident that took place back in what I believe to be January 3rd, 2017. I am employed with the Saint Lawrence Seaway Development Corporation as a warehouse worker. I'm not certain what time of day it was, I'm pretty sure it was in the afternoon. I was standing about halfway in a supply office room of the maintenance building number one, speaking with [REDACTED]. Rick Price was saying goodbye to everyone because he was retiring and that was his last day. [REDACTED] walked into the room and [REDACTED] had her back to us, facing the copier. Rick had already said goodbye to [REDACTED] and I before [REDACTED] came in the room. Rick was getting ready to say goodbye to [REDACTED], with what I thought was going to be an innocent hug. It turned into Rick coming in from what I thought would be a one arm hug from the side. I saw him grab [REDACTED] with one of his arms underneath her armpit, as he came up with what I believe was his left arm, and grabbing her left breast. [REDACTED] and I both had a look of shock on our faces. He was shaking her while this was going on and he looked at her and said, "I'm retiring now. There is nothing you can do to me." as he laughed about it. That was the sick part about it. He thought it was funny. We all dispersed for a few minutes. I'm not certain if there were words exchanged between the two of them. I was still in shock as to what just occurred. Rick left and I went next door to [REDACTED] office to check on her. She was visibly upset but was still dumbfounded that Rick had just done what he had to her. I know that [REDACTED] had not seen what had happened as she was not facing us. I know that [REDACTED] had reported the incident to our security guy. A statement was taken from me at work about it but I never heard anything more as to what happened, other than I know that Rick is no longer allowed out at the Seaway.

Notice

(Penal Law §210.45)

In a written instrument, any person who knowingly makes a false statement which such person does not believe to be true has committed a crime under the laws of the state of New York punishable as a Class A Misdemeanor.

Affirmed under penalty of perjury

this 02 <sup>ND</sup> day of FEBRUARY, 2018

- OR -

\* Subscribed and Sworn to before me

this \_\_\_\_\_ day of \_\_\_\_\_

[REDACTED]

(SIGNATURE OF DEPOSITOR)

Trooper Stephanie Simpson 4267

(WITNESS)

Trooper Stephanie Simpson

(NAME OF PERSON TAKING DEPOSITION)

Time Ended  
02/02/2018 02:38 PM



STATE OF NEW YORK

COUNTY OF St. LawrenceLocal Criminal

COURT

TownOF Massena

THE PEOPLE OF THE STATE OF NEW YORK

-VS-

Richard L. Price

Defendant

PLEASE TAKE NOTICE, pursuant to section 710.30 of the Criminal Procedure Law, that during the trial of the above named matter, the People intend to offer evidence of statements made by the defendant to public servant, TO WIT:

On February 16, 2018, at 3:53 pm, upon being questioned regarding an incident of forcible touching with a former female co-worker at the St. Lawrence Seaway Development Corporation in the Town of Massena, the defendant did state "I know I tried to hug her but that's about it".

In a written instrument, any person who knowingly makes a false statement which such person does not believe to be true has committed a crime under the laws of the State of New York punishable as a Class A Misdemeanor.

NOTICE

Affirmed under penalty of perjury

this 16th day of February, YR 2018

-OR-

Subscribed and Sworn to before me

this \_\_\_\_\_ day of \_\_\_\_\_, YR \_\_\_\_\_

TPH Simpson 4267  
COMPLAINANT